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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of:

Federal-State Joint Board  
on Universal Service

)  
) CC Docket No. 96-45  
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AMERITECH'S COMMENTS ON PETITIONS  
FOR RECONSIDERATION AND/OR REHEARING

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The Ameritech Operating Companies<sup>1</sup> ("Ameritech") offer the following brief comments on two issues raised by some of the Petitions for Reconsideration and/or Rehearing ("Petitions") of the First Report and Order released in this docket on May 8, 1997 ("Report and Order"). In the Report and Order, the Commission adopted rules for a universal service support system that are intended to satisfy the statutory requirements of the 1996 Act,<sup>2</sup> in a manner that is sustainable in the increasingly competitive marketplace.

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<sup>1</sup> The Ameritech Operating Companies are: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Inc.

<sup>2</sup> Pub. L. No. 104-104, 110 Stat. 56.

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Among the various issues which the parties raised in their Petitions, two are of particular concern to Ameritech. The first has to do with the Commission's determination that the federal share of the support for providing service in high cost areas will be 25% of the difference between a carrier's forward-looking cost of providing the supported service and the national benchmark. This is a reasonable allocation of cost between the interstate and intrastate jurisdiction and the Commission should re-affirm this decision notwithstanding the objections of those who want to allocate a greater share of these costs to the interstate jurisdiction. The second issue has to do with whether or not eligible carriers must provide both toll blocking and toll control in order to participate in the low income universal service support mechanisms. On this issue, Ameritech agrees with USTA that the definition of "toll limitation" in the Commission's rules should denote either toll blocking or toll control.

Those parties opposing the Commission's decision to allocate 25% of the costs of providing service in high cost areas to the interstate jurisdiction present a number of arguments in support of their claim that the allocation should be higher. Some parties say, for example, that the 25% figure is not adequately supported in the record.<sup>3</sup> Other parties say that the 25%

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<sup>3</sup> *E.g.*, Texas PUC at 2; Vermont at 4-5.

interstate allocation is not adequate to provide “sufficient” and “predictable” support and, therefore, the Commission’s decision is contrary to the 1996 Act.<sup>4</sup> Still others say that the states are not up to the task of shouldering their fair share of the financial responsibility associated with providing support for universal service, and actually may seek to avoid that responsibility because of political risks.<sup>5</sup>

These arguments are not sufficient to warrant a change in the Commission’s decision to allocate 25% of the costs of providing service in high cost areas to the interstate jurisdiction. As the Commission notes in the Report and Order, loop costs likely will be the predominant cost that varies between high cost and non-high cost areas. A 25% allocation factor currently is applied to assign loop costs to the interstate jurisdiction through the Part 36 separations process. In fact, one of the reasons a 25% factor was adopted for purposes of Part 36 was that it would ensure the permanent protection of universal service. Therefore, it is entirely reasonable to use the same 25% factor to allocate the costs of providing service in high cost areas to the interstate jurisdiction for purposes of universal service support. Besides, the Commission already has indicated

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<sup>4</sup> *E.g.*, Alaska PUC at 8; United Utilities at 3-5; Alaska Tel. Assn. at 1-2; Arkansas PSC at 1-3; Wyoming PSC at 2-4; Rural Tel. Cos. at 9-12; Rural Tel. Coalition at 1-6; *see also* Sprint at 2.

<sup>5</sup> *E.g.*, U S West at 5.

that it is willing to re-visit its 25% allocation factor in the future, after the states have completed their universal service reforms, and determine whether additional federal support is necessary to achieve the universal service principles set out in 47 U.S.C. Section 254(b). Accordingly, the Commission at this time should reject calls for changing its decision to allocate 25% of the costs of providing service in high cost areas to the interstate jurisdiction.

The Commission should make a change, however, in the definition of toll limitation contained in Section 54.400(a)(4) of its new Rules. That section defines toll limitation as “both toll blocking and toll control.” (emphasis added). Toll blocking enables the customer to “elect not to allow the completion of outgoing toll calls from their telecommunications channel.”<sup>6</sup> It is not unreasonable for the Commission to require a carrier to provide toll blocking. Toll control, on the other hand, is defined as “a service provided by carriers that allows consumers to specify a certain amount of toll usage that may be incurred on their telecommunications channel per month or per billing cycle.”<sup>7</sup> It is unreasonable for the

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<sup>6</sup> 47 C.F.R. Section 54.400(2).

<sup>7</sup> 47 C.F.R. Section 54.400(3).

Commission to require a carrier to provide both toll blocking and toll control in order to be eligible for low income universal service support.

Toll control is extremely difficult with today's technology and the current competitive environment. As Ameritech explained earlier in this docket in its comments on the Joint Board recommendation:

the feasibility of providing a comprehensive 'toll limitation service' -- i.e., a service that blocks toll calls after calls amounting a certain predetermined total dollar amount per month have been made -- is very problematic since it would require real time recording and rating of calls that local exchange subscribers make using carriers other than the billing local exchange carrier. For example, Ameritech does not rate calls that its local exchange subscribers make using other carriers, so it would have no way of immediately blocking calls that its subscribers make using, for example, MCI after \$10 worth of calls have already been placed in the billing period.<sup>8</sup>

In other words, even if the hardware and software necessary to provide toll control were available and deployed,<sup>9</sup> the local exchange carrier still may not have the capability to provide toll control because the interexchange carrier ("IXC") is the only one that has the toll usage information necessary

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<sup>8</sup> Comments of Ameritech on Joint Board Recommendation, filed December 19, 1996 at 14.

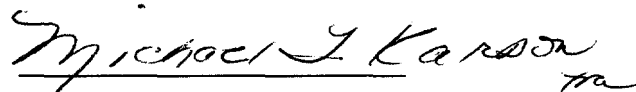
<sup>9</sup> Ameritech currently does not have toll control hardware or software deployed in its network. Therefore, Ameritech would have to undertake a system upgrade to satisfy any Commission requirement that local exchange carriers provide toll control. However, even with this upgrade, Ameritech still would not have any real time capability to rate, record, or control the toll usage generated on an IXC network.

to trigger the control at the predetermined limit. Even if the IXC were willing to share this information with the local exchange carrier, unless the sharing occurred in real time (and there is no reason to believe that it can), it still would be impossible to trigger the control at the time the predetermined limit is reached. Customers then would dispute any charges beyond their predetermined limit and a series of additional billing and collection problems will result.

Under these circumstances, it is unreasonable for the Commission to require toll control, particularly when another alternative -- the use of a prepaid calling card -- will enable subscribers to achieve the very same control over their toll usage, without the attendant problems associated discussed above. Thus, Ameritech supports USTA's request that the definition of "toll control" in 47 C.F.R. Section 54.500(a)(4) be changed to read as follows: "Toll limitation. 'Toll limitation' denotes either toll blocking or toll control." (emphasis added).

In sum, and for the reasons stated, Ameritech supports the Commission's decision to allocate 25% of the costs of providing service in high cost areas to the interstate jurisdiction, and USTA's request to change the definition of toll limitation so that it includes either toll blocking or toll control.

Respectfully submitted,

A handwritten signature in cursive script that reads "Michael J. Karson" with a stylized flourish at the end.

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Dated: August 18, 1997

CERTIFICATE OF SERVICE

I, Edith Smith, do hereby certify that a copy of Ameritech's Comments On Petitions for Reconsideration and/or Rehearing has been served on the parties on the attached service list, via first class mail, postage prepaid, on this 18th day of August, 1997.

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